



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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THOMAS V. SKINNER, DIRECTOR

217/782-6760

September 12, 2000

Mr. Brad Bradley, SR-6J  
Remedial Project Manager  
U.S. Environmental Protection Agency  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Re: Comments on the Draft ESD, received August 3, 2000, for the  
NL Industries Site, Granite City, Illinois

Dear Mr. Bradley:

On August 3, 2000, the Illinois Environmental Protection Agency ("Illinois EPA") received the draft document entitled "Explanation of Significant Differences for the NL Industries Site, Granite City, Illinois". This letter contains the Illinois EPA's comments on the Draft ESD.

**SUMMARY OF SITE HISTORY**

**P.2, first paragraph.** A diagram showing the main industrial site, slag pile, and location of perimeter groundwater monitoring wells and new wells would be helpful in understanding the information presented in the ESD.

**P.4, second paragraph, fourth sentence.** The Illinois EPA disagrees that, "there really is no contaminated groundwater plume at the Site." Groundwater data indicate there is a contaminated groundwater plume at the Site, although its size appears to be limited to approximately 200 feet from the toe of the Taracorp pile.

Further, the Illinois EPA believes the statement, "due to the very limited migration of lead in groundwater, there is no real threat to groundwater currently posed by the Site", while technically may be correct, is not supported in the ESD or Administrative Record for the ESD.

Finally, it appears from the wording in the fourth and fifth sentences in this paragraph, that the lack of a perceived threat to groundwater serves as the basis for determining that groundwater containment is not required. The Illinois EPA believes groundwater containment is not required because there does not appear to be migration of lead in groundwater which would need to be contained. The Illinois EPA does not believe a demonstration of threat is necessarily prerequisite for groundwater containment. The State recommends that the fourth sentence be deleted in its entirety. "Since there really is..."

EPA Region 5 Records Ctr.



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#### **THE BASIS FOR THIS ESD**

**p. 4, first paragraph.** The Illinois EPA agrees that the appropriate remedy for groundwater outside of the perimeter wells should be to continue groundwater monitoring via the expanded monitoring well network, and to develop a contingency plan if exceedances of groundwater standards occur outside the perimeter wells. The groundwater remedy must also address impacted groundwater upgradient of the perimeter wells, to the extent it is required by the March 30, 1990 Record of Decision and the September 29, 1995 Decision Document/Explanation of Significant Differences.


Although the frequency of groundwater monitoring was not specified in the ESD, the Illinois EPA recommends monitoring more frequently than once per five years, particularly in light of the fact that only a few rounds of sampling have been conducted at the additional monitoring wells installed in March and June 2000.

#### **SUPPORT AGENCY COMMENTS**

The Illinois EPA concurs with this ESD, subject to the above comments.

Please feel free to contact me at 217/557-3199 if you have any questions on the contents of this letter. I would like to discuss the above comments with you at your earliest convenience.

Sincerely,



Sandra M. Bron, Project Manager  
Federal Site Remediation Section  
Bureau of Land

cc: Bureau File  
Terry Ayers, Manager, NPL Unit